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7 COUNTY OF CONTRA COSTA  
and CITY OF SAN RAMON  
8

9 UNITED STATES DISTRICT COURT  
10 NORTHERN DISTRICT OF CALIFORNIA  
11

12 ABHINAV BHATNAGAR,  
13

14 Plaintiff

15 v.

16 JASON INGRASSIA, COUNTY OF  
CONTRA COSTA, and CITY OF SAN  
17 RAMON,

18 Defendants.

Case No. CV07-02669 CRB

DECLARATION OF STEPHANIE  
WILLIAMS

19 I, Stephanie Williams, declare:  
20

- 21 1. I make this declaration based on my own personal knowledge and, if called to testify, I  
22 would be competent to testify to the following facts.  
23
- 24 2. I am a forensic toxicologist employed by the Contra Costa County Sheriff's Department  
25 since May of 2004 and am assigned to the Contra Costa County Crime Lab. The Crime  
26 Lab runs tests for not only Contra Costa County, but also for many other police  
27 agencies in the area. I am currently, and was on May 31, 2006, a certified forensic  
28 alcohol supervisor and have been certified as forensic alcohol analyst. I have been

DECLARATION OF STEPHANIE WILLIAMS

specifically trained in the proper manner of performing blood alcohol testing.

3. I hold a BS degree in Genetics from the University of California at Davis. I have an AS degree in Mathematics and Physical Science from American River College.

4. I was trained in forensic alcohol analysis and performed forensic alcohol analysis at the Crime Lab in San Bernadino County. I also took outside courses in the subject of blood alcohol analysis. I was certified by the California Department of Health Services as a forensic alcohol analyst in May of 2000.

5. I was also employed by Washoe County, Nevada Sheriff's Department and received more on-the-job training in alcohol analysis. I also took other training course on alcohol analysis. I was certified as a forensic analyst in alcohol in April of 2001 by the State of Nevada. While working for Washoe County, I was responsible for forensic breath alcohol analyses for all of Northern Nevada.

6. After being hired by the County of Contra Costa, I had additional on-the-job training in alcohol analysis and have continued to keep up with course in the subject.

7. I have performed several thousand blood alcohol tests using the method used to test the blood from kit 34644.

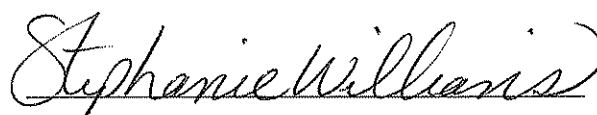
8. On May 26, 2006, I received two sealed vials marked with the name of Mr. Abhinav Bhatnagar and was marked with the kit number 34644. One vial was reserved for future testing. The seals on the vials were unbroken. The paperwork accompanying the vials indicated that it was from blood drawn from Abhinav Bhatnagar drawn on May 20, 2006.

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DECLARATION OF STEPHANIE WILLIAMS

- 1 9. Using standard blood measuring techniques and equipment in compliance with Title 17  
2 of the California Code of Regulations sections 1220, 1220.1(a), 1220.2, 1220.3, and  
3 1220.4 , I tested the blood from the second vial marked with Mr. Bhatnagar's name and  
4 kit number 34644.
- 5
- 6 10. The equipment used was in proper working order and is checked for performance on a  
7 regular basis.
- 8
- 9 11. The blood alcohol result obtained from the testing of the vial of blood marked with Mr.  
10 Bhatnagar's name and the kit number 34644 was **0.09 % W/V Blood Alcohol**.
- 11
- 12 12. This blood alcohol result is consistent with a Preliminary Alcohol Screening (PAS)  
13 results of 0.091 % and 0.092 % obtained an hour before the blood draw assuming that  
14 the PAS device was properly calibrated and used.
- 15
- 16 13. Exhibit F attached to this declaration is a true and correct copy of the report of the  
17 results my testing of Mr. Bhatnagar's blood on May 31, 2006.
- 18
- 19 14. Exhibit K is a true and correct copy of the outside of the envelope which was sealed  
20 when I received it. At the time I received it, the envelope contained the two sealed vials  
21 containing Mr. Bhatnagar's blood. On the outside of the envelope is the signed chain  
22 of custody with my signature showing the date I received it.
- 23

24 The above statements are true and correct. Executed under penalty of perjury on March  
25 27, 2008 in Martinez, California.

26  
27 

28 STEPHANIE WILLIAMS

DECLARATION OF STEPHANIE WILLIAMS